



TEESTA URJA LIMITED

(A Government of Sikkim Enterprise)

TUL/CERC/IEGC/190712

Date 12th July 2019

The Secretary

Central Electricity Regulatory Commission
3rd & 4th Floor, Chanderlok Building
6, Janpath, New Delhi-110 001

Sub: 1200 MW Teesta III HE Project, Sikkim - **Comments/Suggestions on modifications to be made in existing Indian Electricity Grid Code**

Ref: CERC's Public Notice No. ENGG/2012/1/2019-CERC dated 21.06.2019

Sir,

With reference to Hon'ble Commission's Public Notice cited above, please find attached the comments of Teesta Urja Ltd. on the changes/modifications to be made in existing Indian Electricity Grid Code.

Thanking you

Yours faithfully
For **Teesta Urja Ltd.**

(Jaideep Lakhtakia)
General Manager

Enclosures: As above.

S.no	Clause No.	Regulation	Comments by TUL
1.	6.4.24	<p><i>Hydro generating stations are expected to respond to grid frequency changes and inflow fluctuations. Maximum deviation allowed during a time block shall be as per the CERC Deviation Settlement Mechanism Regulations.</i></p>	<p>Under this regulation, hydro stations are expected to support the grid during frequency fluctuations. However, deviation on such account is governed by Deviation Settlement Mechanism Regulations.</p> <p>Under the present DSM Regulations (Regulation 7(10)), charges are leviable for sign change. Further, w.e.f. 1st April 2020 additional charges shall be leviable for sustained deviation beyond 6th time block (1st proviso to Regulation 7(10)(b)). Considering hydro projects support the grid both during high & low frequencies, following suggestion is made with respect to levy of charges/additional charges for sign change:</p> <p>a. When the frequency is greater than 50.05 Hz: Under Injection shall be permitted beyond 6-time blocks and no additional charges shall be levied for sign change pursuant to present 1st proviso to Regulation 7(10)(b).</p> <p>b. When the frequency is lesser than 49.85 Hz: Over Injection shall be permitted beyond 12 time/6 time blocks and no charges & additional charges shall be levied for sign change pursuant to present Regulation 7(10).</p>
2.	6.5.19 & 6.5.19(A)	<p>6.5.19: <i>Notwithstanding anything contained in Regulation 6.5.18, in case of forced outage of a unit of a generating station (having generating capacity of 100 MW or more) and selling power under Short Term bilateral transaction (excluding collective transactions through power exchange), the generator or electricity trader or any other agency selling power from the unit of the generating station shall immediately intimate the outage of the unit along with the requisition for revision of schedule and estimated time of restoration of the unit, to SLDC/RLDC, as the case may be.</i></p> <p>6.5.19(A): <i>In case of revision of schedule of a generating unit, the schedules of all transactions under the long-term access, medium-term open access and short-term open access (except collective transactions through power exchange), shall be reduced on pro-rata basis.</i></p>	<p>It is proposed that following text may be deleted from:</p> <p>a. Regulation 6.5.19 <i>"(excluding collective transactions through power exchange)"</i></p> <p>b. Regulation 6.5.19(A) <i>"(except collective transactions through power exchange)"</i></p> <p>Justification: Under the SOR for 1st Amendment to Grid Code, CERC while allowing revision for STOA of short term bilateral transactions had held as below:</p> <p><i>"Regarding the comment by POSOCO, Adani Power, MB Power, JSW Power Trading and R2I, it is observed that the objective of this Regulation is to provide proper signal to all concerned utilities in case of forced outage of the unit by revising the schedules. We are of the view that if generation is reduced from the generating unit, then there is no point in keeping the original schedule which would</i></p>

give wrong signal for the buyer as he would continue overdrawing from the grid even though the generation is reduced and affect the grid security”.

It is submitted that such provision related to revision of schedule of short term bilateral transactions was brought under the Grid Code in view of grid security. Further, it is submitted that volume of trade under Collective transactions have been increasing continuously over the years, details of which are provided in the table below:

SHORT TERM MARKET IN INDIA

S.N.	YEAR	COLLECTIVE TRANSACTIONS (BU)
1.	2009-10	7.19
2.	2011-12	15.54
3.	2017-18	47.70
4.	2018-19	50.15

It is further submitted that since the Grid Code was implemented in 2010, the volume under collective transactions has been increasing at a compounded annual growth rate of 24%. Further, many big generators with capacity beyond 100 MW are trading under collective transactions.

Presently, the Grid Code allows revision through real-time curtailment for collective transactions in case of transmission constraints in line with the provisions of Regulation 6.5.28, 6.5.30 and 6.5.31 of Grid Code and the same is also being done by NLDC, being the nodal agency for collective transaction. As such, there is no procedural problem in curtailment of schedule for the buyers and sellers under exchange in the event of any transmission line tripping. Accordingly, the same can be implemented in case of forced outage beyond the control of the generator selling under collective transactions.

Accordingly, revision of schedule needs to be permitted in case of collective transactions as well for forced outage of generating unit/power station of more than 100 MW capacity.